



August 8, 2014

Sylvia Mathews Burwell, Secretary, US Department of Health and Human Services
Marilyn Tavenner, Administrator, Centers for Medicare & Medicaid Services
7500 Security Boulevard, MS S2-26-12
Baltimore, Maryland 21244-1850
Submitted via: [Medicaid.gov](http://www.Medicaid.gov)

**Re: New Hampshire's *Building Capacity for Transformation* Section 1115
Demonstration Waiver Application**

Dear Secretary Burwell and Administrator Tavenner:

Thank you for the opportunity to comment on New Hampshire's Section 1115 Medicaid Demonstration Waiver application, entitled Building Capacity for Transformation.

This letter is being submitted on behalf of NH Voices for Health (VOICES). VOICES is a non-partisan, statewide network of organizations and individuals allied in the commitment to quality affordable health care and coverage for residents of New Hampshire. Our organization represents more than 380,000 members, consumers, and constituents across our state.

VOICES strongly supports New Hampshire's proposed Building Capacity for Transformation Waiver, and urges your approval of the pending application. The proposed waiver advances innovative, sensible, and cost-effective approaches to Medicaid reform that promote vital service delivery to vulnerable populations and make needed improvements across delivery systems in our state.

That said, and in particular, we want to speak to our support for the Waiver's proposed Oral Health program for pregnant women and mothers of children up to the age of 5.

Studies have shown that basic oral health services for pregnant women reduce adverse pregnancy outcomes, including pre-term *and* low birth-weight babies. Basic oral health care for pregnant women *also* has been shown to reduce the transmission of dental disease from mothers to children.

As a result, the public health benefit to mothers and children of this proposed Oral Health demonstration is groundbreaking. At the same time, the *cost-savings* likely to result to Medicaid and to our overall health system – whether it's avoiding the expense of neo-natal intensive care for even a small number of newborns, or reducing the cost of dental caries and decay for children – is truly impressive.

Oral health education and coverage for mothers of children up to the age of 5 provides moms *and* kids with a meaningful opportunity for access to essential dental care to stay healthy. Studies indicate that the best way to ensure that kids are healthy, and have access to the care they need, is when parents are covered as well. And mothers whose coverage includes basic oral health care are in better overall health to work, to care for their families, and to take part in communities.

While helping mothers to gain better health, the proposed Oral Health program promotes newborns' and children's health in ways that are meaningful and even profound. The proposed Oral Health demonstration pilot is a humane, pragmatic, sensible, and cost-effective opportunity for our state that addresses critical need.

VOICES applauds the NH Department of Health & Human Services for proposing this helpful dental benefit and promising demonstration program, and respectfully urges CMS and the honorable Secretary of the federal Department of Health & Human Services to approve it.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas G. Bunnell", with a long horizontal flourish extending to the right.

Thomas G. Bunnell, Esq., Policy Consultant
NH Voices for Health